

**From:** Brock Willis  
**To:** McMullen, Bruce; Stephen Weil; Cgrice@memphisprobatelaw.com; Joshua Levin; Antonio Romanucci; bmckinney@gmlblaw.com; brooke@bencrump.com; bwachtel@mendelsonfirm.com; Colton Johnson Taylor; dgodwin@gmlblaw.com; dm@mendelsonfirm.com; domemphislaw@darrelloneal.com; Foster, Freeman; fjohnson@johnsonandjohnsonattys.com; jkp\_perrygriffin.com; Silk, Jennie; jspence@spencepartnerslaw.com; keenandl@aol.com; martin@sparkman-zummach.com; Robert Spence; Sam Harton; Sarah Raisch; stephenleffler@yahoo.com; support@smitticklaw.com  
**Cc:** Cindy Migliore; Zandra Frazier  
**Subject:** RE: 23-cv-02224-MSN-atc Wells v. CITY OF MEMPHIS et al  
**Date:** Monday, March 24, 2025 10:10:40 AM  
**Attachments:** image002.png  
image003.png  
image004.png  
image005.png  
image006.png

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Mr. Weil and Mr. McMullen,

Thank you both for your emails. If any party seeks relief, please file a motion. Likewise, any party opposing such relief should file a response.

Please address these matters on the record rather than by email.

Best,

**Brock Willis**

Law Clerk to the Honorable Mark S. Norris  
United States District Court for the Western District of Tennessee  
Odell Horton Federal Building  
167 N. Main Street, Ste. 907  
Memphis, TN 38103  
901-495-1379



**From:** McMullen, Bruce <bmcmullen@bakerdonelson.com>

**Sent:** Monday, March 24, 2025 9:50 AM

**To:** Stephen Weil <SWeil@rblaw.net>; Brock Willis <Brock\_Willis@tnwd.uscourts.gov>; Cgrice@memphisprobatelaw.com; Joshua Levin <JLevin@rblaw.net>; Antonio Romanucci <aromanucci@rblaw.net>; bmckinney@gmlblaw.com; brooke@bencrump.com;

bwachtel@mendelsonfirm.com; Colton Johnson Taylor <cjohnson@rblaw.net>;  
dgodwin@gmlblaw.com; dm@mendelsonfirm.com; domemphislaw@darrelloneal.com; Foster,  
Freeman <ffoster@bakerdonelson.com>; fjohnson@johnsonandjohnsonattys.com;  
jkip\_perrygriffin.com <JKP@perrygriffin.com>; Silk, Jennie <jsilk@bakerdonelson.com>;  
jspence@spencepartnerslaw.com; keenandl@aol.com; martin@sparkman-zummach.com; Robert  
Spence <rspence@spencepartnerslaw.com>; Sam Harton <sharton@rblaw.net>; Sarah Raisch  
<sraisch@rblaw.net>; stephenrleffler@yahoo.com; support@smitticklaw.com

**Cc:** Cindy Migliore <Cindy\_Migliore@tnwd.uscourts.gov>; Zandra Frazier  
<Zandra\_Frazier@tnwd.uscourts.gov>

**Subject:** Re: 23-cv-02224-MSN-atc Wells v. CITY OF MEMPHIS et al

**CAUTION - EXTERNAL:**

Mr Weil,

I can't tell from the wording of your email, but are you saying your firm is just seeing the order today? I find that hard to believe. Or are you saying just that "you only" are just seeing the order? For the record, I oppose any motion for extension of time.

**Bruce A. McMullen**

Office Managing Shareholder

Baker, Donelson, Bearman, Caldwell & Berkowitz

First Tennessee Building

[165 Madison Avenue - Suite 2000](#)

[Memphis, TN 38103](#)

Direct Dial: [901.577.2356](#)

Direct Fax: [901.577.4262](#)

Email: [bmcmullen@bakerdonelson.com](mailto:bmcmullen@bakerdonelson.com)

Firm Website: [www.bakerdonelson.com](http://www.bakerdonelson.com)

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represents clients across the U.S. and abroad from offices  
in Alabama, Florida, Georgia, Louisiana, Maryland, Mississippi,  
South Carolina, Tennessee, Texas, Virginia and Washington, D.C.

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**From:** Stephen Weil <[SWeil@rblaw.net](mailto:SWeil@rblaw.net)>

**Sent:** Monday, March 24, 2025 9:40:11 AM

**To:** Brock Willis <[Brock\\_Willis@tnwd.uscourts.gov](mailto:Brock_Willis@tnwd.uscourts.gov)>; [Cgrice@memphisprobatelaw.com](mailto:Cgrice@memphisprobatelaw.com)  
<[Cgrice@memphisprobatelaw.com](mailto:Cgrice@memphisprobatelaw.com)>; Joshua Levin <[JLevin@rblaw.net](mailto:JLevin@rblaw.net)>; Antonio Romanucci  
<[aromanucci@rblaw.net](mailto:aromanucci@rblaw.net)>; [bmckinney@gmlblaw.com](mailto:bmckinney@gmlblaw.com) <[bmckinney@gmlblaw.com](mailto:bmckinney@gmlblaw.com)>; McMullen,  
Bruce <[bmcmullen@bakerdonelson.com](mailto:bmcmullen@bakerdonelson.com)>; [brooke@bencrump.com](mailto:brooke@bencrump.com) <[brooke@bencrump.com](mailto:brooke@bencrump.com)>;  
[bwachtel@mendelsonfirm.com](mailto:bwachtel@mendelsonfirm.com) <[bwachtel@mendelsonfirm.com](mailto:bwachtel@mendelsonfirm.com)>; Colton Johnson Taylor  
<[cjohnson@rblaw.net](mailto:cjohnson@rblaw.net)>; [dgodwin@gmlblaw.com](mailto:dgodwin@gmlblaw.com) <[dgodwin@gmlblaw.com](mailto:dgodwin@gmlblaw.com)>;  
[dm@mendelsonfirm.com](mailto:dm@mendelsonfirm.com) <[dm@mendelsonfirm.com](mailto:dm@mendelsonfirm.com)>; [domemphislaw@darrelloneal.com](mailto:domemphislaw@darrelloneal.com)  
<[domemphislaw@darrelloneal.com](mailto:domemphislaw@darrelloneal.com)>; Foster, Freeman <[ffoster@bakerdonelson.com](mailto:ffoster@bakerdonelson.com)>;  
[fjohnson@johnsonandjohnsonattys.com](mailto:fjohnson@johnsonandjohnsonattys.com) <[fjohnson@johnsonandjohnsonattys.com](mailto:fjohnson@johnsonandjohnsonattys.com)>;  
[jkip\\_perrygriffin.com](mailto:jkip_perrygriffin.com) <[JKP@perrygriffin.com](mailto:JKP@perrygriffin.com)>; Silk, Jennie <[jsilk@bakerdonelson.com](mailto:jsilk@bakerdonelson.com)>;

[jspence@spencepartnerslaw.com](mailto:jspence@spencepartnerslaw.com) <[jspence@spencepartnerslaw.com](mailto:jspence@spencepartnerslaw.com)>; [keenandl@aol.com](mailto:keenandl@aol.com) <[keenandl@aol.com](mailto:keenandl@aol.com)>; [martin@sparkman-zummach.com](mailto:martin@sparkman-zummach.com) <[martin@sparkman-zummach.com](mailto:martin@sparkman-zummach.com)>; Robert Spence <[rspence@spencepartnerslaw.com](mailto:rspence@spencepartnerslaw.com)>; Sam Harton <[sharton@rblaw.net](mailto:sharton@rblaw.net)>; Sarah Raisch <[sraisch@rblaw.net](mailto:sraisch@rblaw.net)>; [stephenrleffler@yahoo.com](mailto:stephenrleffler@yahoo.com) <[stephenrleffler@yahoo.com](mailto:stephenrleffler@yahoo.com)>; [support@smitticklaw.com](mailto:support@smitticklaw.com) <[support@smitticklaw.com](mailto:support@smitticklaw.com)>

**Cc:** Cindy Migliore <[Cindy\\_Migliore@tnwd.uscourts.gov](mailto:Cindy_Migliore@tnwd.uscourts.gov)>; Zandra Frazier <[Zandra\\_Frazier@tnwd.uscourts.gov](mailto:Zandra_Frazier@tnwd.uscourts.gov)>

**Subject:** RE: 23-cv-02224-MSN-atc Wells v. CITY OF MEMPHIS et al

Dear Mr. Willis and Counsel,

Please accept our apologies for what appears to have been an electronics problem.

I am responsible for handling this matter. I received ECF 352 on Friday and attempted to open it. I was unable to do so, and called chambers. Chambers informed me that they were aware of the problem and were working on it. I attempted to open the link again later Friday evening and was still unable to do so.

I attempted to open the link again this morning, and still was unable to do so. My paralegal, however, informs me that she is able to open the link, and she transmitted a copy of the order to me a few moments ago.

I suspect this may be a problem created by “cookies” with my computer, resulting from my previous attempts to open the order link.

I have been preparing a declaration. We are working to ensure we have all relevant communications on the topic to attach to the declaration, which concerns several communications between paralegal staff in our office and the Court Clerk’s office.

I would respectfully request until 12:00 p.m. Central today to submit the declaration so that we can be sure to have gathered all responsive communications for the declaration.

We are happy to file a motion seeking that relief should the Court desire.

Respectfully,

Stephen H. Weil

**Stephen H. Weil**  
Senior Attorney

**e:** [sweil@rblaw.net](mailto:sweil@rblaw.net)  
**p:** (312) 253-8592  
**f:** (312) 458-1004



[www.rblaw.net](http://www.rblaw.net)

**a:** 321 N Clark St, Ste  
900, Chicago, IL 60654



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**From:** Brock Willis <[Brock\\_Willis@tnwd.uscourts.gov](mailto:Brock_Willis@tnwd.uscourts.gov)>

**Sent:** Monday, March 24, 2025 9:22 AM

**To:** [Cgrice@memphisprobatelaw.com](mailto:Cgrice@memphisprobatelaw.com); Joshua Levin <[JLevin@rblaw.net](mailto:JLevin@rblaw.net)>; Antonio Romanucci <[aromanucci@rblaw.net](mailto:aromanucci@rblaw.net)>; [bmckinney@gmlblaw.com](mailto:bmckinney@gmlblaw.com); [bmcmullen@bakerdonelson.com](mailto:bmcmullen@bakerdonelson.com); [brooke@bencrump.com](mailto:brooke@bencrump.com); [bwachtel@mendelsonfirm.com](mailto:bwachtel@mendelsonfirm.com); Colton Johnson Taylor <[cjohnson@rblaw.net](mailto:cjohnson@rblaw.net)>; [dgodwin@gmlblaw.com](mailto:dgodwin@gmlblaw.com); [dm@mendelsonfirm.com](mailto:dm@mendelsonfirm.com); [domemphislaw@darrelloneal.com](mailto:domemphislaw@darrelloneal.com); [ffoster@bakerdonelson.com](mailto:ffoster@bakerdonelson.com); [fjohnson@johnsonandjohnsonattys.com](mailto:fjohnson@johnsonandjohnsonattys.com); [jkg\\_perrygriffin.com](mailto:jkp_perrygriffin.com) <[JKP@perrygriffin.com](mailto:JKP@perrygriffin.com)>; [jsilk@bakerdonelson.com](mailto:jsilk@bakerdonelson.com); [jspence@spencepartnerslaw.com](mailto:jspence@spencepartnerslaw.com); [keenandl@aol.com](mailto:keenandl@aol.com); [martin@sparkman-zummach.com](mailto:martin@sparkman-zummach.com); [rspence@spencepartnerslaw.com](mailto:rspence@spencepartnerslaw.com); Sam Harton <[sharton@rblaw.net](mailto:sharton@rblaw.net)>; Sarah Raisch <[sraisch@rblaw.net](mailto:sraisch@rblaw.net)>; [stephenrleffler@yahoo.com](mailto:stephenrleffler@yahoo.com); [support@smitticklaw.com](mailto:support@smitticklaw.com); Stephen Weil <[SWeil@rblaw.net](mailto:SWeil@rblaw.net)>

**Cc:** Cindy Migliore <[Cindy\\_Migliore@tnwd.uscourts.gov](mailto:Cindy_Migliore@tnwd.uscourts.gov)>; Zandra Frazier <[Zandra\\_Frazier@tnwd.uscourts.gov](mailto:Zandra_Frazier@tnwd.uscourts.gov)>

**Subject:** 23-cv-02224-MSN-atc Wells v. CITY OF MEMPHIS et al

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Counsel,

As you know, on **March 21, 2025**, the Court entered a Sealed Order (ECF No. 352) ordering the Plaintiff to file a sealed declaration by Monday, March 24, 2025, at 9:00 a.m.

There is no record of such a filing on the docket, and the deadline has now passed.

The Clerk's Office has confirmed that all attorneys of record have access to the sealed order and that access was granted on March 21, 2025.

Judge Norris expects the Plaintiff to file the declaration without delay.

Best,

**Brock Willis**

Law Clerk to the Honorable Mark S. Norris

United States District Court for the Western District of Tennessee

Odell Horton Federal Building

167 N. Main Street, Ste. 907

Memphis, TN 38103

901-495-1379



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